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5 Attorneys for Defendant Acuity,
A Mutual Insurance Company

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 BERENICE CASTRO, an individual,

9 Plaintiff,

10 v.

11 ACUITY, A MUTUAL INSURANCE
12 COMPANY; DOES I-V, inclusive; and ROE
13 CORPORATIONS I-V, inclusive,

14 Defendants.

Case No: 2:18-cv-01514-JAD-CWH

**STIPULATION AND [PROPOSED] ORDER
FOR EXTENSION OF TIME TO FILE
RESPONSIVE PLEADING TO
PLAINTIFF'S COMPLAINT**

(First Request)

15 Defendant ACUITY, A MUTUAL INSURANCE COMPANY ("Acuity Insurance"), by and
16 through its counsel of record, CHAD C. BUTTERFIELD, ESQ., of the law firm WILSON, ELSER,
17 MOSKOWITZ, EDELMAN & DICKER LLP, and Plaintiff Berenice Castro, by and through her
18 counsel of record, DAVID F. SAMPSON, ESQ., of the LAW OFFICE OF DAVID SAMPSON,
19 hereby stipulate and agree to extend the deadline for filing a responsive pleading from the current
20 deadline of August 21, 2018 up to and including September 5, 2018.

21 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the
22 requested extension, as counsel for Acuity Insurance has only recently been retained to represent
23 Acuity Insurance in this matter and seeks additional time to evaluate Plaintiff's Complaint and the
24 allegations and claims set forth therein. Furthermore, counsel for Plaintiff will be out of the country
25 celebrating his twenty-fifth wedding anniversary from August 21, 2018 through September 5, 2018.
26 Accordingly, the requested extension will not unreasonably delay the litigation of this case.

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The parties agree that the requested extension furthers the interests of this litigation and is not being requested in bad faith or to delay these proceedings unnecessarily.

This is the parties' first request for extension of the deadline.
DATED this 20th day of August, 2018.

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

/s/ Chad C. Butterfield

Chad C. Butterfield, Esq.
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300 South Fourth Street, 11th Floor
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*Attorneys for Defendant Acuity,
A Mutual Insurance Company*

DATED this 20th day of August, 2018.

LAW OFFICE OF DAVID SAMPSON

/s/ David F. Sampson

David F. Sampson, Esq.
Nevada Bar No. 6811
630 S. 3rd Street
Las Vegas, NV 8901
Attorney for Plaintiff Berenice Castro

ORDER

GOOD CAUSE SHOWN, IT IS SO ORDERED.

Dated August 21, 2018

Ans. H

UNITED STATES MAGISTRATE JUDGE